

UNITED STATES DISTRICT COURT

for the

Eastern District of California

FILED

Nov 09, 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

United States of America

v.

Jacob Jacobsen

Case No. 1:22-mj-00172-BAM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of no later than 1/2020 - 9/2022 in the county of Stanislaus in the
Eastern District of California, the defendant(s) violated:

*Code Section**Offense Description*Title 18, United States Code,
Section 2251(a) and (e)

Sexual Exploitation of a Minor and Attempt

Title 18, United States Code,
Section 2252(a)(2);

Receipt of a visual depiction of a minor engaged in sexually explicit conduct

This criminal complaint is based on these facts:

See attached affidavit of Federal Bureau of Investigation Special Agent Kevin Kandow, incorporated here by this reference.

☒ Continued on the attached sheet.


Complainant's signature

Kevin Kandow, Special Agent

Printed name and title

Sworn to me in accordance with Fed.R.Crim.P. 4.1 by email
and telephone.

Date: 11/8/22


Judge's signature

City and state: Fresno, California

Hon. Barbara A. McAuliffe - U.S. Magistrate Judge

Printed name and title

1
2 **IN THE UNITED STATES DISTRICT COURT**
3 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

4 **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AGAINST**
5 **JACOB JACOBSEN**

6 **I. INTRODUCTION AND AGENT BACKGROUND**

7 I, Kevin Kadow, Special Agent, U.S. Department of Justice, Federal Bureau of Investigation
8 (FBI), being duly sworn, state as follows:

9 1. I make this affidavit in support of an application for a criminal complaint and arrest
10 warrant under Federal Rule of Criminal Procedure 4.

11 2. I am an FBI special agent, and I have been since March 1, 2020. I attended over 20
12 weeks of training at the FBI Academy in Quantico, Virginia and received training in areas including
13 criminal investigations and constitutional law. I have planned and executed multiple federal search
14 warrants including search warrants for investigations involving the sexual exploitation of children. I
15 have assisted with planning and executing federal arrest warrants. I have been assigned to the Stockton
16 Safe Streets Task Force conducting investigations of narcotics, firearms, gang violence, and crimes
17 against children. I have also received specialized training focused on crimes involving the use of
18 Snapchat.¹

19 3. As a Special Agent with the FBI, I have received training in the investigation and
20 prosecution of violations of various federal laws, including those related to child pornography. I have
21 received specialized training related to crimes against children. I have interviewed multiple victims and
22 witnesses for investigations involving child sexual exploitation, child pornography, and other crimes
23 against children. I have observed and reviewed thousands of examples of child pornography (as defined
24 in 18 U.S.C. § 2256) in all forms of media, including computer media. As a federal agent, I am
25 authorized to investigate violations of the laws of the United States and to execute warrants issued under
26 the authority of the United States. Moreover, I am a federal law enforcement officer who is engaged in

27
28 ¹ Snapchat is an American multimedia instant messaging app and service developed by Snap Inc. (originally
Snapchat Inc.). One of the principal features of Snapchat is that pictures and messages are usually only available
for a short time before they become inaccessible to their recipients.

1 enforcing criminal laws, including 18 U.S.C. §§ 2251 and 2252. The information contained in this
2 affidavit is based on my training, personal knowledge and experience, my review of records and
3 documents, as well as information related to me by witnesses and other law enforcement personnel.
4 Because this affidavit is being submitted for the limited purpose of establishing probable cause for a
5 criminal complaint, I have not included every fact known to me concerning this investigation. Rather, I
6 have set forth only those facts that I believe are necessary to establish probable cause to obtain an arrest
7 warrant for JACOBSEN.

8 4. Based on the facts set forth below, I believe that there is probable cause to believe that
9 multiple federal laws, specifically 18 U.S.C. § 2251(a), (sexual exploitation of children) and 2252(a)(2)
10 (receipt of a visual depiction of a minor engaged in sexually explicit conduct) have been violated by
11 JACOBSEN. This affidavit therefore supports my application for an arrest warrant for JACOBSEN for
12 these offenses.

13 III. PROBABLE CAUSE

14 5. On November 13, 2020, LM (LM are the initials of the mother of a minor victim
15 identified in this affidavit as LS) reported to the Memphis Police Department (MPD) that LS, her 13-
16 year-old daughter, was communicating with the user of Snapchat account **trippinj**. LS described the
17 user of **trippinj** as a 22-year-old male who was from California. LM stated that **trippinj** requested
18 sexually explicit images and videos from her daughter and that her daughter did send sexually explicit
19 images to **trippinj**. LS used her iPhone 6 to take and send the images and videos. LM provided MPD
20 with her daughter's iPhone. LM's complaint was recorded in an MPD report. The iPhone was tagged as
21 evidence in the MPD's Property and Evidence Room.

22 6. A state search warrant was issued and executed on December 2, 2020, from the General
23 Sessions Court of Memphis, Shelby County, Tennessee for Snapchat accounts **trippinj** and LS. On
24 March 8, 2021, Snapchat returned the requested data for the **trippinj** and LS accounts. Sgt. Paul
25 Hutchinson found that most of **trippinj**'s messages were with teen-aged females. In the event that the
26 Snapchat user listed their age as 18 in the chat, **trippinj** offered to pay that user via Cash App for nude
27 photos. In chats where the Snapchat user provided an age of under 18, **trippinj** sent compliments to the
28 Snapchat user before attempting to foster an online relationship. Sgt. Paul Hutchinson found that the

1 user of the **trippinj** account provided the name “Jacob” when sending money to Minor Victim “KB” via
2 Venmo for access to her nude photos and videos.

3 7. On September 30, 2021, Sergeant (Sgt) Paul Hutchison of the MPD requested FBI
4 assistance with the investigation of Snapchat user **trippinj**.

5 8. Sgt. Hutchison provided FBI Task Force Officer (TFO) John Chevalier with his reports
6 and material acquired during his investigation. Included in the material were the contents of Snapchat
7 accounts **trippinj** and LS (which had been acquired by a state search warrant issued to Snapchat). TFO
8 John Chevalier reviewed the Snapchat accounts and also spoke with LM regarding her November 13,
9 2020, complaint to MPD. TFO Chevalier and I observed the following in the search warrant returns for
10 the Snapchat accounts **trippinj** and LS.

11 **MINOR VICTIM – LS**

12 9. Below is an excerpt from a Snapchat text conversation between **trippinj** (hereafter
13 referred to as TR for the chat transcripts) and Snapchat user “LS”. The below conversation appeared to
14 occur on or around September 30, 2020.

15 TR: Okay and are you 18?

16 LS: no

17 LS: 13

18 TR: Oh. Okay nvm I gtg

19 LS: Lol

20 LS: Bye

21 TR: Bye

22 LS: K

23 LS: Yes

24 TR: How old?

25 TR: Do you like

26 TR: Why am I even attracted to you (sad emoji² face)

27 TR: I shouldn't be doing this

28 ² An emoji is a pictogram, logogram, ideogram or smiley embedded in text and used in electronic messages and web pages. The primary function of an emoji is to fill in emotional cues otherwise missing from typed conversation.

1 LS: What you look like

2 TR: Idk if I should show you. I still don't know if I should even talk to you%2C but
3 you are hot...

4 LS: Why can't you talk to me

5 LS: And should me what you look like

6 TR: Does that bother you?

7 LS: So

8 LS: I won't tell

9 10. **Trippinj** asked LS how old she was, to which she responded "13". I believe LS was 13
10 years old during this conversation based upon other information I have acquired as part of the
11 investigation. **Trippinj** then responded "Oh. Okay nvm I gtg". "nvm" stands for "never mind" and "gtg"
12 stands for "got to go". In the same conversation, between 10-15 minutes later, **trippinj** messaged LS
13 "Why am I even attracted to you" and "I shouldn't be doing this." I believe **trippinj** knew what LS
14 looked like, although it is not apparent how he would have acquired that knowledge. I believe **trippinj**
15 stated he "shouldn't be doing this" in reference to talking to a girl who he believed to be under the age
16 of 18. **Trippinj** eventually responded with "Idk if I should show you. I still don't know if I should even
17 talk to you%2C but you are hot...". I believe **trippinj**'s statement of not knowing if he should talk to LS
18 was because he knew she was 13 years old and was attracted to her. Also, the "%2C" is likely
19 placeholder text for an emoji. Below is an excerpt which occurred later on during the same conversation
20 between **trippinj** (TR) and LS on or around September 30, 2020.

21 TR: I feel like you're freaky too and that would get me in trouble (sweating emoji)

22 TR: I'd spoil the fuck out of you if you were mine lol

23 LS: Mmmm

24 LS: What would you do

25 LS: Hello

26 TR: I still can't tell if you're down... show me you are first

27 LS: (Sent a picture of an apparent teenage female, fully clothed)

28 LS: (Sent a picture of an apparent teenage female, fully clothed)

1 LS: (Sent two pictures of an apparent teenage female, fully clothed)

2 TR: Damn... I definitely feel like you got an ass

3 11. **Trippinj** messaged LS with "I feel like you're freaky too and that would get me in
4 trouble". I believe **trippinj** was trying to entice LS by stating "you're freaky too" and also reemphasized
5 that he would get in "trouble" which I believe meant that **trippinj** had intentions of obtaining nude
6 pictures and/or videos from LS but knew that it was wrong and/or illegal. **Trippinj** messaged LS with "I
7 still can't tell if you're down... show me you are first". I believe **trippinj** wanted LS to send him
8 pictures of her before he would show her a picture of himself. I also believe that **trippinj** wanted to
9 gauge whether LS was willing to provide pictures of herself. LS responded by sending four pictures of
10 what appears to be a teenage female who is fully clothed. Based on this chat, and my knowledge of the
11 physical description of LS, I believe the female in the pictures was LS. Below is an excerpt which
12 occurred later during the same conversation between **trippinj** (TR) and LS on or around September 30,
13 2020.

14 TR: Have you ever sent nudes or had sex? (eye emojis) I'm feeling like you're kinda
15 experienced

16 TR: And damn (sad face emoji)

17 LS: Not had sex yet saving that for someone

18 LS: Yes I have

19 TR: Got me curious how cute those tits are tbh...

20 12. **Trippinj** messaged LS with "Have you ever sent nudes or had sex? I'm feeling like
21 you're kinda experience". I believe **trippinj** was again gauging LS's interest and willingness to provide
22 **trippinj** with nude pictures and/or videos of herself. LS responded with "Not had sex yet saving that for
23 someone" and then "Yes I have". I believe LS's response of "Yes I have" was in reference to having
24 sent "nudes" of herself to someone else. Below is a Snapchat text message excerpt which occurred later
25 on between **trippinj** (TR) and LS on or around October 5, 2020.

26 TR: I bet my baby has the prettiest pussy though tbh (sent several emojis)

27 LS: Have you seen it

28 TR: Nooo I need to (sad face emoji)

1 LS: Mmm ok

2 TR: You should really show me (devil face emoji)

3 LS: Yeah maybe

4 TR: Mm no maybes (devil face emoji)

5 LS: Lol

6 TR: You know who's in charge (devil face emoji)

7 LS: Who me

8 TR: You know I'm in charge baby (devil face emoji) I'd be spanking that ass right
9 now for being bad

10 TR: I'm off now

11 LS: Mmm I I would like that

12 LS: YAY

13 TR: I know you would I know baby likes it rough. Fuck I need you

14 LS: Yeah I do

15 TR: (Sent an audio message to LS. The audio message was from a male voice who
16 said "*You have no fucking idea how bad I wanted you at work.*" The audio
17 message is three seconds long.)

18 13. **Trippinj** sent a message to LS which read "I bet my baby has the prettiest pussy though
19 tbh". I believe **trippinj** sent this message to try and solicit picture of LS's vagina. LS responded with
20 "Have you seen it" to which **trippinj** stated "Nooo I need to". **Trippinj** then stated again "You should
21 really show me" which I believe is in reference to LS's vagina. Later, **trippinj** stated "I'm off now"
22 which I believe meant **trippinj** was getting off work. **Trippinj** also sent an audio message to LS which
23 depicted a male talking. The male, who I believe to be the user of the **trippinj** account, stated "*You have*
24 *no fucking idea how bad I wanted you at work*". I believe when **trippinj** stated "wanted you" **trippinj**
25 meant that he was fantasizing about having sex with LS while he was at work. Below is an excerpt
26 which occurred later on during the same conversation between **trippinj**(TR) and LS on or around
27 October 5, 2020.

28 TR: (Sent an audio message to LS. The audio message was from a male voice who

1 said *"I want you to send me some videos while I'm driving so I can open them*
2 *when I get home ok baby."* The audio message is five seconds long.)

3 TR: (Sent an audio message to LS. The audio message was from a male voice who
4 said *"I want you to save them and send them in chat."* The audio message is two
5 seconds long.)

6 TR: (Sent an audio message to LS. The audio message was from a male voice who
7 said *"I just want you to get me hard for when I get home so I can fuck you good."*
8 The audio message is three seconds long.)

9 14. **Trippinj** sent an audio message to LS. The audio message depicted a male voice. I
10 believe, based on the chat conversation, that the male voice was that of **trippinj**. In the audio message,
11 **trippinj** requested LS to send him videos before he would get home. **Trippinj** then sent another audio
12 message requesting LS to save the videos in their chat which I believe is in reference to their Snapchat
13 text conversation thread. **Trippinj** then sent a message which said *"I just want you to get me hard for*
14 *when I get home so I can fuck you good."* I believe **trippinj** was trying to solicit LS to send him nude
15 and/or sexually explicit videos of LS to help **trippinj** obtain an erection. Below is an excerpt which
16 occurred later on during the same conversation between **trippinj** (TR) and LS on or around October 5,
17 2020.

18 LS: (Sent two videos to **trippinj**. The videos depict an apparent teenage female fully
19 nude. The female is masturbating with her fingers. The female's face is visible.)

20 LS: (Sent six videos to **trippinj**. The videos depicted an apparent teenage female fully
21 nude. The female is bent over on a bed with her vagina and anus facing the
22 camera. The female is masturbating with her fingers. At one point during the
23 videos, the female's face is visible.)

24 LS: (Sent five videos to **trippinj**. The videos depicted an apparent teenage female
25 fully nude. The female is lying on a bed and masturbating with her fingers. The
26 female's face is visible during the videos.

27 LS: (Sent nine videos to **trippinj**. Three of the videos depict an apparent teenage
28 female who is nude from the waist up. The female is touching her breasts with her

1 hands. The other six videos depicted a teenage female, fully nude, who is bent
2 over with her anus and vagina exposed. The female is masturbating with her
3 fingers during the video.

4 LS: There babe enjoy

5 TR: Omggg I can't wait to look (sad face emoji) fuck you're such a good girl baby

6 15. In the above Snapchat chat excerpt, LS sent **trippinj** 22 videos, all of which depicted a
7 teenage girl either completely or partially nude and engaging in sexually explicit conduct. Based on the
8 context of the chat between LS and **trippinj**, and my knowledge of the physical description of LS, I
9 believe that the female depicted in those videos was LS. I believe that LS sent **trippinj** the above-
10 described videos based on the request from **trippinj** from earlier on in the chat thread where **trippinj**
11 sent LS an audio message which stated "*I want you to send me some videos while I'm driving so I can*
12 *open them when I get home ok baby*". **Trippinj** replied after receiving the videos with "Omggg I can't
13 wait to look". I believe **trippinj** intended to view the videos that LS sent to him once **trippinj** arrived
14 back home from work. Below is an excerpt which occurred later during the same conversation between
15 **trippinj**(TR) and LS on or around October 5, 2020.

16 TR: I just got home right now

17 LS: Good

18 TR: I'm getting ready you still horny for me baby?

19 LS: Yes

20 TR: Good give me 2 mins

21 TR: Ughhh getting me so hard

22 TR: Fuck

23 TR: My baby has the prettiest pussy I swear (heart face emoji)

24 LS: It's so wet

25 TR: I saw fuck I wanna taste it baby (devil face emoji and tongue emoji) I just wish I
26 was there

27 16. **Trippinj** sent a message to LS stating that he "just got home" and "I'm getting ready you
28 still horny for me baby?" I believe **trippinj** asked LS if she was "still horny" to gauge if LS was willing

1 to either send more nude and sexually explicit videos and/or to do a Snapchat video call. **Trippinj**
 2 eventually sent LS a message which read “My baby has the prettiest pussy I swear”. I believe **trippinj**
 3 sent this message because **trippinj** viewed the videos referenced above which depicted LS’s nude body.
 4 LS responded with “It’s so wet” which I believe is in reference to LS’s vagina. **Trippinj** then responded
 5 with “I saw fuck I wanna taste it baby”. I believe this message from **trippinj** also confirms that **trippinj**
 6 opened and viewed the sexually explicit videos sent from LS. Below is an excerpt which occurred later
 7 on during the same conversation between **trippinj**(TR) and LS on or around October 5, 2020.

8 TR: I’m gonna fuck my dirty little sluts tight pussy

9 LS: Mmm

10 TR: Omg moan and tell daddy to fuck your tight little 13 year old pussy baby fuck

11 TR: I’m getting so close

12 TR: Those vids (sent several emojis)

13 LS: (Sent an audio message to **trippinj**. The audio message was of a female voice
 14 who said “*Daddy I want you to fuck my tight 13 year-old pussy.*”

15 17. In the above Snapchat chat excerpt, **trippinj** sent LS a message which read “Omg moan
 16 and tell daddy to fuck your tight little 13 year old pussy baby fuck”. I believe that LS was 13 years old at
 17 the time of this chat and that **trippinj** was aware of LS’s age. **Trippinj** then messaged LS with “Those
 18 vids”. I believe “vids” is short for “videos” and that **trippinj** was referencing the above videos that
 19 depicted LS engaging in sexually explicit activities. Below is an excerpt which occurred later during the
 20 same conversation between **trippinj** (TR) and LS on or around October 5, 2020.

21 TR: Ugh make that vid. I’m going to cum for you

22 TR: Omggg did you save it like a good girl?

23 LS: no

24 TR: Mm do it again but start rubbing that pussy then go up and rub your titties and say
 25 cum for me daddy and open that mouth with your tongue out for it all

26 TR: Save it (devil face emoji)

27 LS: Kk

28 18. **Trippinj** sent LS a message which read “Ugh make that vid. I’m going to cum for you”. I

1 believe **trippinj** was requesting LS to make a video of LS engaged in sexually explicit activities.

2 **Trippinj** then sent LS a message asking if LS saved the video to which LS responded “no”. **Trippinj**
3 then sent the following message” “Mm do it again but start rubbing that pussy then go up and rub your
4 titties and say cum for me daddy and open that mouth with your tongue out for it all” and then “Save it”.
5 I believe **trippinj** was instructing LS on creating a video in which LS was supposed to masturbate, then
6 fondle her breasts, and then stick her tongue out. **Trippinj** then requested LS to save the video.

7 19. On November 5, 2021, FBI Child Adolescent Forensic Interviewer Hillary Kozloski-
8 Smith interviewed LS. LS was accompanied by her mother, LM. During the interview, LS confirmed
9 having conversations with Snapchat user **trippinj** starting sometime around October 2020. LS believed
10 that **trippinj**’s real name was “James”. LS stated she told **trippinj** her age during their chat
11 conversations. LS was 13 years old when she began communicating with **trippinj**. When asked how old
12 **trippinj** was, LS stated “20”. After LS started chatting with **trippinj**, at some point they started sharing
13 “inappropriate” pictures and text messages. LS described the “inappropriate” pictures as LS being naked
14 and sending the pictures to **trippinj**. LS also described the pictures and videos as LS doing “stuff” to
15 which LS elaborated as playing with her “vagina”, “boobs”, and “butt”. LS described **trippinj** as being
16 “demanding” in regard to the types of pictures and videos he wanted to see. When asked if **trippinj**
17 instructed LS to send another picture and/or video or do something different, LS stated that **trippinj**
18 would tell LS to keep sending the pictures and/or “bend over”. **Trippinj** also instructed LS where LS
19 should place her fingers in her own vagina. This was based off a picture that LS had sent to **trippinj** of
20 LS’s vagina. **Trippinj** took the picture and circled an area around LS’s vagina and sent that picture back
21 to LS to show her where to place her fingers. LS also stated that she had had calls with **trippinj** and
22 had seen what **trippinj** looked like. **Trippinj** sent LS “Snaps³” in which LS described being able to see
23 **trippinj**’s face and penis. In the Snap pictures that **trippinj** sent to LS, LS described seeing a
24 “white/tannish” color bathtub behind **trippinj** as well as **trippinj**’s bedroom. LS described the bedroom
25 as having a bluish tint with the walls having a “tannish/white” color. **Trippinj** supposedly lived with a
26 roommate as well. LS described the user **trippinj** as being white, and having blonde hair, blue eyes, and

27 ³ Available to all users since day one, a Snap is a picture or video that is sent through the app to one or more friends.
28 A video snap can be a maximum of 60 seconds in length (known as a Long Snap). Keeping in line with the app’s original
feature, Snapchat doesn’t retain any photo or video content; the platform deletes content after the recipient has viewed the
Snap.

1 a beard. LS stated that **trippinj** talked to her about his parents and that LS thought that **trippinj** “has a
 2 mom up there” but that his “dad is not really in his life”. When asked where **trippinj** lived, LS thought
 3 it was California or Carolina but could not remember which one. When asked if there were any plans for
 4 LS and **trippinj** to meet up, LS stated they did not really plan to do that. In the Snapchat chat
 5 conversation between **trippinj** and LS, **trippinj** would sometimes save LS’s pictures and videos in the
 6 chat. LS did not know what **trippinj**’s phone number was and stated that they did not talk to each other
 7 outside of the Snapchat application. They did both video and audio calls via the Snapchat application.
 8 They did calls “every now and then”. LS described **trippinj**’s voice as a “man” voice. During the video
 9 calls, **trippinj** usually didn’t turn on his camera but when **trippinj** did have his camera on, LS could see
 10 his face and the headboard of **trippinj**’s bed. LS described the headboard’s color as “black”. During the
 11 video calls, **trippinj** would sometimes instruct LS to do the same sexually explicit activities as what LS
 12 did in the pictures and videos she sent to **trippinj** referenced above. During the interview, LS identified
 13 still images from videos which the LS Snapchat account sent to **trippinj** and confirmed that she was the
 14 female depicted in the still images. The still images depicted LS’s vagina, breasts, and vaginal
 15 masturbation. LS was shown pictures taken from the Facebook account jacob.JACOBSEN.lol which
 16 depicted a white adult male with blonde hair and a beard. The pictures shown to LS are below:



(From Facebook Account Jacob.JACOBSEN.lol)



(From Facebook Account Jacob.JACOBSEN.lol)

25 When shown the pictures above, LS described the person in these pictures as “James” and as the person
 26 she was talking to who used the Snapchat account **trippinj**.

27 20. Also, observed from the LS Snapchat search warrant returns was a chat involving the
 28 user of Snapchat account **treydawgg2000**. In that chat, **treydawgg2000** stated the person was from

1 California and was 16 years old. During the chat, the **treydawgg2000** account solicited LS for nude
2 pictures of herself.

3 21. In total, I observed 53 videos that LS sent to **trippinj**. The videos depicted LS either
4 partially nude or completely nude and engaging in sexually explicit activities such as masturbating by
5 digital penetration and inserting objects into her vagina.

6 **MINOR VICTIM - JA**

7 22. I observed a Snapchat chat conversation between **trippinj** and Snapchat user "JA". The
8 conversation appeared to occur on or around April 3, 2020. **Trippinj** contacted the Snapchat user JA to
9 solicit JA for nude pictures and/or videos. **Trippinj** asked JA how old she was during the chat, and JA
10 responded with "17". **Trippinj** made references to himself masturbating during the Snapchat text
11 conversation. JA sent **trippinj** several pictures which depicted an apparent teenage female. Of those
12 pictures, one picture depicted a female's exposed breasts. With the flash activated, the focus of the
13 image is on her clothed breasts and vagina. I believe that JA sent the nude picture and other images of
14 her only wearing a bra and underwear in response to **trippinj**'s request. **Trippinj** offered to pay JA for
15 the pictures and/or videos via Venmo. The identity of JA is known, and she was 17 years old on April 3,
16 2020, when **trippinj** solicited images from her. In total, I observed 2 pictures that JA sent to **trippinj**.
17 The pictures depicted JA either partially nude or completely nude.

18 **MINOR VICTIM - KB**

19 23. I observed a Snapchat chat conversation between **trippinj** and "KB" which occurred on
20 or around June 15, 2020. In the conversation, **trippinj** asked how much for KB's "premium". I believe
21 that **trippinj** was referring to how much he would have to pay for nude pictures and videos of KB.
22 **Trippinj** asked KB how old she was. KB responded with sending **trippinj** a picture which was a collage
23 of pictures. In the collage, there were two pictures which depicted exposed breasts of a female. KB also
24 stated "16" which I believe was KB responding to **trippinj** about her age. **Trippinj** then requested a
25 payment method from KB to which KB stated she used Venmo⁴. KB then provided her Venmo account
26 information. **Trippinj** then asked if KB showed her "pussy on the prem". I believe that **trippinj** was

27 _____
28 ⁴ Venmo is an American mobile payment service founded in 2009 and owned by PayPal since 2012. Venmo was aimed at friends and family who wish to split bills, e.g. for movies, dinner, rent, or event tickets etc

1 trying to solicit nude pictures and videos of KB's vagina. KB responded with "no but i'll send that
2 personal". **Trippinj** then confirmed KB's Venmo account and stated to KB that "It's gonna be from
3 Jacob". I believe the "Jacob" name is in reference to **trippinj**'s real name which is Jacob JACOBSEN
4 and that the Venmo account that **trippinj** was using is associated with the name Jacob. On that same day
5 she also sent a collage of images that included images of her breasts. The identity of KB is known. KB
6 was 14 years old on or around June 15, 2020. In total, I observed 6 pictures that KB sent to **trippinj**. The
7 pictures depicted KB either partially nude or completely nude.

8 24. On October 25, 2021, in response to a Grand Jury subpoena, PayPal⁵ provided the
9 records for Venmo account associated with KB. The records indicated a payment of \$10 was received
10 on June 14, 2020, from Jacob JACOBSEN whose account number was 6669970 which was associated
11 with IP address 68.74.137.64.

12 25. On October 26, 2021, in response to a Grand Jury subpoena, PayPal provided the records
13 for Venmo account 666970. The records listed the account user as Jake J, username Dubbner, email
14 address jacobJACOBSEN@att.net and jacobj2013@sbcglobal.net, with a telephone number listed as
15 209-534-XXXX.

16 MINOR VICTIM - GI

17 26. I observed a Snapchat chat conversation between **trippinj** and "GI" that occurred on or
18 around July 3, 2020. **Trippinj** asked GI how old she was, to which GI responds "boutta be 15". I believe
19 GI was 14 years old and was about to turn 15 at the time of this conversation. **Trippinj** responded with
20 "I'm 16%2C 17 in December." I believe **trippinj** lied about his age to GI because he wanted to seem
21 closer in age to GI and thus would be more likely to be able to obtain nude pictures and/or videos from
22 GI. Later, in the same conversation, **trippinj** stated "show me what's mine". I believe **trippinj** was
23 asking GI to send him nude pictures and videos of GI. GI first sent five videos which depicted a female
24 masturbating with a toothbrush. GI then sent another four videos of a female masturbating with a brush.
25 It is unclear who the female is but, based on GI's conversation with **trippinj**, I believe the female
26 depicted in the videos was GI. In total, I observed 3 pictures and 13 videos that GI sent to **trippinj**. The

27
28 ⁵ PayPal Holdings, Inc. is an American multinational financial technology company operating an online payments system in the majority of countries that support online money transfers and serves as an electronic alternative to traditional paper methods such as checks and money orders.

1 pictures and videos depicted GI either partially nude or completely nude and engaging in sexually
2 explicit activities such as masturbating by inserting objects into her vagina.

3 **MINOR VICTIM - PL**

4 27. I observed a Snapchat chat conversation between **trippinj** and "PL" that occurred on or
5 around July 12, 2020. **Trippinj** asked PL how old PL was, to which PL responded "16". I believe PL
6 was 16 years old at the time of this conversation. PL then asked **trippinj** if he wanted to buy
7 "premium". I believe PL was referring to a collection of nude pictures and videos of PL that PL would
8 sell. **Trippinj** responded with "I'm 16%2C 17 in December" and "I've never bought one before I don't
9 normally pay for nudes". I believe **trippinj** has bought nude pictures and/or videos from other Snapchat
10 users but that **trippinj** stated he never had to make it seem as though this was something he didn't
11 normally do. Below is an excerpt which occurred later on during another conversation between **trippinj**
12 and PL which occurred on or around July 12, 2020. Later, during the same conversation, **Trippinj** sent
13 PL a message which read "This is my second account lmao" which I believe meant that **trippinj** had
14 another Snapchat account. **Trippinj** then sent PL a message stating the other account was
15 "**treydawgg2000**" and that **treydawgg2000** was his main account. **Trippinj** then stated that his real
16 name was trey.

17 28. I observed another Snapchat chat conversation between **trippinj** and PL which occurred
18 on or around September 27, 2020. **Trippinj** messaged PL if PL had "anymore content". I believe
19 **trippinj** was referring to nude pictures and/or videos of PL. PL responded "I'm not doing it no more".
20 **Trippinj** eventually asked if PL had any saved "vids" or "pics" that PL could post. I believe **trippinj**
21 was trying to solicit more nude pictures and videos of PL and wanted PL to post it to PL's premium
22 channel so **trippinj** could view them. **Trippinj** stated that he "was a buyer and bought prem" which I
23 believe meant that **trippinj** had already bought nude pictures and videos from PL in the past.

24 29. I observed another Snapchat chat conversation between **trippinj** and PL which occurred
25 on or around November 30, 2020. PL reached out to **trippinj** asking if **trippinj** would send her \$10 for
26 "2 20 second vids". **Trippinj** responded with "They new ones" to which PL sent **trippinj** her Cash App
27 tag. PL then sent **trippinj** four videos, three of which depicted a female masturbating. It is unclear who
28 the female is from the videos but based on the Snapchat conversation, I believe the female was PL. The

1 identity of playboy_livy is known. PL was 16 years old on November 30, 2020. In total, I observed 1
2 picture and 4 videos that PL sent to **trippinj**. The pictures and videos depicted PL either partially nude
3 or completely nude and engaging in sexually explicit activities such as masturbating by digital
4 penetration and inserting objects into her vagina.

5 **MINOR VICTIM – SO**

6 30. I observed a Snapchat chat conversation between **trippinj** and “SO” that occurred on or
7 around September 24, 2020. In the conversation, **trippinj** provided instructions to SO to perform
8 different sexually explicit activities to do via a video call or video. **Trippinj** stated “Omg how are you
9 16”. I believe **trippinj** was aware of SO’s age, which I believe was 16 years old, during this
10 conversation. **Trippinj** then asked SO to show him more which I believe meant more pictures and
11 videos of SO engaging in sexually explicit activities. **Trippinj** then stated “I wish I was there fucking
12 you right now”. Later, in the same conversation, SO sent **trippinj** five videos which depicted a female
13 inserting a pink object into her anus. It is not clear who the female is based on the angle of the camera
14 but, based on the Snapchat conversation, I believe the female is SO. **Trippinj** responded to the videos
15 with “you like it in the ass too”. SO responded “yup”. SO then sent another five videos which depicted a
16 female in a bathtub inserting a black brush into her anus. In these videos, the female’s face is visible.
17 **Trippinj** responded with “would you ever fuck for cash”. I believe **trippinj** was trying to solicit SO to
18 have sex with him in exchange for money. Based on the conversation above, it is believed that SO was
19 16 years old at the time of this conversation. In total, I observed 1 picture and 65 videos that SO sent to
20 **trippinj**. The pictures and videos depicted SO either partially nude or completely nude and engaging in
21 sexually explicit activities such as masturbating by inserting objects into her vagina and anus.

22 **MINOR VICTIM - SI**

23 31. I observed a Snapchat chat conversation between **trippinj** and “SI” that occurred on or
24 around July 17, 2020. **Trippinj** asked SI how old SI was. SI responded with “16”. I believe SI was 16
25 years old during this conversation.

26 32. I observed another Snapchat chat conversation between **trippinj** and SI that occurred on
27 or around October 9, 2020. **Trippinj** messaged SI “You sending the rest”. I believe this is in reference
28 to nude pictures and/or videos that **trippinj** was trying to obtain from SI. **Trippinj** also recommended

1 that he was “down to do this each week” which I believe means **trippinj** wanted to receive nude pictures
2 and/or videos from SI on a weekly basis. SI sent a message “\$100 now” and then SI sent six videos to
3 **trippinj** which depicted a female masturbating and inserting her fingers into her vagina. **Trippinj**
4 responded with “Oml you so worth it fuck wasn’t there more though”. I believe **trippinj** viewed the
5 nude and sexually explicit videos that SI sent and that **trippinj** was trying to solicit more sexually
6 explicit videos from SI. In total, I observed 2 pictures and 8 videos that SI sent to **trippinj**. The
7 pictures and videos depicted SI either partially nude or completely nude and engaging in sexually
8 explicit activities such as masturbation by digital penetration.

9 SUMMARY OF TRIPPINJ SNAPCHAT REVIEW

10 33. Based on the Snapchat chat conversations referenced above, as well as other Snapchat
11 chat conversations observed from the search warrant returns, I believe that the user of the **trippinj**
12 account used the account to contact females he believed or knew, based on information provided to him,
13 to be minors. He would then engage the minor females in communications designed to have the minor
14 females create and then send to him still and video images of the minors engaging in sexually explicit
15 conduct such as displaying their genital, pubic, or anal areas and or masturbating. Often, the **trippinj**
16 user confirmed the other Snapchat user’s name and knowingly continued to solicit and receive images of
17 the minor engaged in sexually explicit conduct. I estimate that the potential total number of minors with
18 whom JACOBSEN communicated using the **trippinj** and **treydawgg2000** Snapchat accounts to be
19 more than 175. The user of the **trippinj** account also obtained nude pictures and videos from individuals
20 over the age of 18.

21 IDENTITY OF THE USER OF THE TRIPPINJ and TREYDAWGG2000 ACCOUNT

22 34. On November 8, 2021, Snapchat provided data in response to a federal search warrant
23 requesting data for accounts **trippinj** and **treydawgg2000**. The search warrant returns for both **trippinj**
24 and **treydawgg2000** revealed that both accounts contained nude pictures and videos of what appeared to
25 be teenage girls. Specifically, I found a series of pictures and videos that Snapchat user “LI” sent to
26 **treydawgg2000** on or around September 23, 2021. The pictures and videos depicted a female, likely
27 between 11-13 years old based on her physical features and development, who wore a bra and
28 underwear during the videos but then undressed so that she was fully nude. The female’s vagina is

1 exposed as well as her breasts and anus. The female did not have any visible pubic hair.

2 35. The search warrant returned the same internet protocol (IP) address associated with both
3 the **trippinj** and **treydawgg2000** accounts, specifically IP address 68.74.137.64. That IP address was
4 assigned to internet service provider AT&T which provided service records for IP address 68.74.137.64
5 in response to a subpoena. Between October 2020 and September 2021, the records indicated that IP
6 68.74.137.64 was assigned to customer account number 296165790, Julie Jacobsen, with the service
7 location at an address on Monte Verde Ct., Modesto, CA, 95350. An additional subpoena was served for
8 the **trippinj** account in August 2022. Snapchat responded and showed the same IP address,
9 68.74.137.64, was still associated with the **trippinj** account. AT&T provided service records for IP
10 address 68.74.137.64 in response to a subpoena for the month of August 2022. The response from
11 AT&T revealed that the IP address was still assigned to Julie Jacobsen with the same service location at
12 on Monte Verde Ct., Modesto, CA 95350. Based on this information, and that the **trippinj** user stated
13 his other Snapchat account was **treydawgg2000**, I believe both the **trippinj** and **treydawgg2000**
14 Snapchat accounts were controlled by the same user and that the user. This belief is consistent with
15 information from the interview on November 5, 2021, of minor victim LS who identified an image of
16 the owner of Facebook page jacob.jacobsen.lol as the person using Snapchat account **trippinj** during
17 their live Snapchat video chats and from the Snaps **trippinj** sent to her.

18 36. **Trippinj** paid minor victim KB using Venmo. Venmo records indicate that the Venmo
19 account associated with the payment to KB was controlled by Jacob Jacobsen. A grand jury subpoena
20 for the records listed the account user as Jake J, username Dubbner, with email addresses
21 jacobJACOBSEN@att.net and jacobj2013@sbcglobal.net, with a telephone number listed as 209-534-
22 XXXX.

23 37. On November 18, 2021, FBI (Memphis) Task Force Officer John Chevalier received
24 records for California Driver's License number F5238633. The license was issued to Jacob Michael
25 Tackett Jacobsen, date of birth 12/15/1994, with an address on Monte Verde Ct., Modesto, CA, 95350.
26 The driver's license records included a picture of JACOBSEN taken on February 8, 2018. The driver's
27 license picture closely matched the pictures shown to minor victim LS.



DMV Photo of Jacob Jacobsen

Date: 02/08/2018

38. On September 14, 2022, agents conducted a ruse knock and talk at the Monte Verde Ct address in Modesto, CA. An Agent was disguised as delivering a FedEx package. The agent knocked on the security gate of the front door of the residence. An adult male opened the door. The adult male had reddish blonde hair. The adult male stated he needed to put pants on. The adult male then closed the door and went back into the residence. A few minutes later, the adult male opened the front door and security gate. The adult male had reddish blonde hair, appeared to be about 6'2", 260 lbs. Based on my prior knowledge of the physical description of Jacob JACOBSEN, I believe that the person identified the adult male as JACOBSEN.

39. On September 24, 2022, two federal search warrants were authorized in the Eastern District of California. The warrants were a federal search warrant for the Snapchat accounts **trippinj** and **treydawgg2000** as well as a federal residential search warrant (residential search warrant) for the address on Monte Verde Ct, Modesto, CA, the person of Jacob Jacobsen, cell phone 209-534-XXXX and JACOBSEN's devices.

40. On September 26, 2022, a federal search warrant for the **trippinj** and **treydawgg2000** accounts was served to Snap Inc. Snap refused to execute the warrant unless some language was added to one of the attachments. An edited federal search warrant for the **trippinj** and **treydawgg2000** accounts was obtained on October 24, 2022, and served on Snap on October 25, 2022. Snap returned the requested information for both accounts on November 1, 2022. I have not been able to review the entirety of these returns but based upon an initial review there are nude pictures and videos of females

1 appearing to be girls in the teens consistent with what was found on prior search warrants for the
2 **trippinj** and **treydawgg2000** accounts. Some of the most recent communications with people who
3 appeared to be minors occurred up until September 29, 2022, including minor victim LS.

4 41. On September 29, 2022, the federal search warrant for the residence on Monte Verde Ct.,
5 Modesto, CA, the person of Jacob Jacobsen, cell phone number 209-534-XXXX, and JACOBSEN's
6 devices was executed. During the searches, JACOBSEN consented to an interview with agents. Prior to
7 the interview, JACOBSEN was advised of his Miranda Rights and signed an Advice of Rights form in
8 acknowledgement of waiving his rights and agreeing to talk to Agents. The interview was recorded.
9 During the interview, JACOBSEN provided the following information.

10 42. JACOBSEN confirmed his address on Monte Verde Ct., Modesto, CA, date of birth
11 12/15/1994, SSN, and cell phone number 209-534-XXXX. JACOBSEN described his cell phone as a
12 blue iPhone 12. JACOBSEN said he had owned the iPhone 12 for about two years. JACOBSEN had an
13 iPhone 7 before the iPhone 12. JACOBSEN stated that he had the iPhone 7 for about five years.
14 JACOBSEN also used a PC for gaming. JACOBSEN stated that he built the PC himself.

15 43. During the interview, JACOBSEN was asked about the Snapchat accounts **trippinj** and
16 **treydawgg2000**. JACOBSEN stated that he created both the **trippinj** and **treydawgg2000** accounts, had
17 sole access to the accounts, and that both accounts were still active. JACOBSEN stated that the
18 **treydawgg2000** account was an "older" account that he had created before the **trippinj** account, but that
19 the **treydawgg2000** account was still active. JACOBSEN used both accounts to obtain nude pictures
20 and/or videos of girls.

21 44. During the interview, JACOBSEN was shown a Snapchat chat conversation that occurred
22 between the user of the **trippinj** account and minor victim "LS" account in September and October
23 2020. JACOBSEN admitted to knowing that LS was 13 years old when the communications were taking
24 place. JACOBSEN admitted to requesting and receiving nude photos and videos of LS.

25 45. JACOBSEN also admitted to requesting and receiving nude photos and videos from other
26 Snapchat accounts of girls under the age of 18. When asked how long JACOBSEN had been receiving
27 nude pictures and/or videos from girls under the age of 18, JACOBSEN stated that it was at least 5-7
28 years, possibly 10 years. JACOBSEN stated that the youngest girl he received nude pictures and/or

1 videos from was 13 years old.

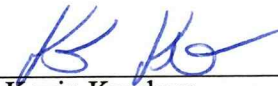
2 46. When asked if JACOBSEN had used the older iPhone 7 before he obtained the iPhone 12
3 to obtain nude pictures and/or videos from girls under the age of 18, JACOBSEN stated that he had.

4 **V. CONCLUSION**

5 47. I believe that JACOBSEN used Snapchat accounts **trippinj** and **treydawgg2000** to
6 solicit and receive nude and/or sexually explicit pictures, videos, and video calls from other Snapchat
7 users. I believe that while using Snapchat, JACOBSEN knowingly sexually exploited minors by asking
8 and directing them to engage in sexually explicit conduct while creating still and video images of that
9 conduct. JACOBSEN also received and possessed that same material when the minor victims sent the
10 material to him at his request. Based on my training, experience, and the information contained within
11 this Affidavit, I believe that probable cause exists that JACOBSEN violated the following statutes: 18
12 U.S.C. § 2251(a), (sexual exploitation of a child); 2252(a)(2) and (a)(4)(B) (receipt, distribution, and
13 possession of child pornography); and 2422(b) (online enticement).

14 48. Based on the foregoing, I request that the Court issue the proposed criminal complaint
15 and arrest warrant.

16 Respectfully submitted,

17
18  11/8/22
19 Kevin Kadow
20 Special Agent
21 Federal Bureau of Investigation

22 Sworn to before me by telephone and signed by me under authority of
23 Federal Rules of Criminal Procedure 4.1 and 4(d) on November 8, 2022.

24 
25 The Honorable Barbara A. McAuliffe
26 United States Magistrate Judge

27 Reviewed and approved as to form

28 /s/ David Gappa
David Gappa
Assistant U.S. Attorney